

EXHIBIT R

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

MARTHILDE BRZYCKI,)
)
 Plaintiff(s),)
)
 vs.) 2:18-cv-01582-MJP
)
 HARBORVIEW MEDICAL CENTER, and)
 UNIVERSITY OF WASHINGTON,)
)
 Defendant(s).)

DEPOSITION UPON ORAL EXAMINATION OF

 REID STELL

Taken at 1111 Third Avenue, Suite 3000
 Seattle, Washington

DATE TAKEN: NOVEMBER 7, 2019
REPORTED BY: PATSY D. JACOY, CCR 2348

1 A. Yes, and they did not require a diagnosis.

2 Q. Okay. And in none of those sessions did you
3 provide a diagnosis?

4 A. Yes.

5 Q. Okay. Now, your first session with
6 Ms. Brzycki that was not in the KePRO EAP process was
7 on January 11, 2017, correct?

8 A. Correct.

9 Q. And that is the first time that you actually
10 provided an ICD-10 diagnosis, correct?

11 A. Correct.

12 Q. Now, did you do that because if you didn't you
13 wouldn't be paid by Regence?

14 A. Yes.

15 Q. Okay. So, in other words, to ensure that you
16 were paid by Regence and that your patient, your
17 client, wasn't stuck with the bill, you had to put in
18 something as an ICD-10 diagnosis?

19 A. Yes.

20 Q. Okay. And here you identified code as F4322.
21 Is that adjustment disorder with anxiety under the
22 ICD-10?

23 A. Yes.

24 Q. Okay. How did you reach that conclusion? How
25 did you -- I'll ask it a better way. How did you come

1 to diagnose Ms. Brzycki with adjustment disorder with
2 anxiety?

3 A. At this point in my career I don't -- I
4 recognize symptoms and fit them to a diagnosis based on
5 experience.

6 Q. Okay. What is adjustment disorder with
7 anxiety? Obviously it's a diagnosis under the ICD-10,
8 but what are the symptoms of -- what are the symptoms
9 that you would see that would lead you to make that
10 diagnosis?

11 A. The symptoms include anxiety, sleeplessness,
12 irritability, as a result of external conditions.

13 Q. Did Ms. Brzycki have all of those symptoms?

14 A. Yes.

15 Q. Okay. Now, at this point you understood that
16 Ms. Brzycki was seeing a primary care provider?

17 A. Yes.

18 Q. Okay. In the Procedure Notes section there's
19 a reference to a PCP, right?

20 A. Yes.

21 Q. Okay. In fact, it says: Her PCP -- primary
22 care provider -- advised her to take another month off.
23 Is that right?

24 A. Yes.

25 Q. Okay. And did you know who her primary care

1 humiliation by managers at Harborview you don't have
2 personal knowledge?

3 A. Absolutely right.

4 Q. Okay. And then below in Other Restrictions
5 and Effects of Medication, I'll try this, it looks like
6 you wrote: Client would be able to work at another UW
7 facility?

8 A. Yes.

9 Q. Okay. And then there's a question below that
10 it says: Anticipated duration of these restrictions.
11 You wrote: Recommend immediate transfer?

12 A. Yes.

13 Q. And then next to the box it says: Are these
14 restrictions medically necessary? You checked yes.

15 A. Yes.

16 Q. All right. So let me see if I get this
17 straight. As of July 12, 2017, when you completed this
18 form, you were representing to the university that
19 Ms. Brzycki could not at that time perform the
20 functions of her job?

21 A. Yes.

22 Q. Okay.

23 A. In the environment where she currently worked.

24 Q. Okay. But you were also indicating that --
25 you were recommending a medical leave of absence

1 starting July 15, 2017 to an unknown end date?

2 A. Yes.

3 Q. Okay. And you were also recommending an
4 immediate transfer to a different job?

5 A. Yes. Those seem like two different
6 recommendations, don't they?

7 Q. Right. So what -- what -- were you
8 recommending both that she be put on medical leave for
9 this job and that the UW find her a different job?

10 A. No. I was recommending one or the other.

11 Q. Okay. And you were letting the university
12 make that decision?

13 A. I had no control over their decision.

14 Q. Okay. All right. Why were you recommending
15 on July 12, 2017 that she go on a medical leave of
16 absence?

17 A. To get her out of that environment.

18 Q. Okay. Why were you recommending as an
19 alternative that she be transferred to a different job
20 or a different UW facility?

21 A. To get her out of that environment.

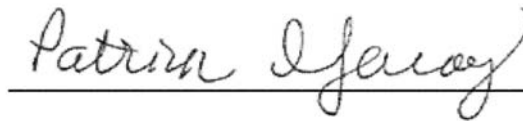
22 Q. Okay. Whose idea was it that as of July 15,
23 2017, Ms. Brzycki go on a medical leave of absence; was
24 it hers or yours?

25 A. It was -- I guess you could say it was a

1 CERTIFICATE

2
3 STATE OF WASHINGTON)
4)
5 COUNTY OF KING)

6 I, Patricia D. Jacoy, a Certified
7 Shorthand Reporter in and for the State of Washington,
8 do hereby certify that the foregoing transcript of the
9 deposition of REID STELL taken on November 7, 2019 is
10 true and accurate to the best of my knowledge, skill
11 and ability.

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15 Patricia D. Jacoy, CSR 2348
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